

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING)
(UPS PROPOSALS ONE, TWO AND THREE)) Docket No. RM2016-2

**UNOPPOSED MOTION OF
AMAZON FULFILLMENT SERVICES, INC.,
FOR ACCESS TO MATERIALS FILED UNDER SEAL
BY UNITED PARCEL SERVICE, INC.
AND UNITED STATES POSTAL SERVICE**

(October 16, 2015)

Pursuant to 39 C.F.R. § 3007.40, Amazon Fulfillment Services, Inc. ("Amazon"), respectfully requests (1) immediate access to UPS library reference UPS-RM2016-2/LR-NP1 (filed by UPS under seal in this docket on October 8, 2015), and (2) continued access to the non-public data that the Commission made available to Amazon's outside counsel and consultants in Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*.

Amazon intends to provide the material to the following individuals, each of whom was previously approved by the Commission in Order Nos. 2520 and 2538 as reviewing representatives in Docket No. RM2015-7: Lawrence G. Buc, Robert P. Davis, Sander Glick, Peter M. Kiesel and David M. Levy. Amazon and its reviewing representatives will continue to abide by the terms of the protective conditions that they have signed limiting the use of this material.

Both the nonpublic UPS library reference in the current docket, and the nonpublic material previously made available to Amazon under seal in Docket No. RM2015-7, were filed under seal because they contain information that the Postal Service has designated as protected. Amazon's outside counsel and experts need continuing access to this information to evaluate and respond to the UPS filing in the present docket.

The Postal Service and UPS have authorized Amazon to state that they do not oppose this request.

Respectfully submitted,

/s/

David M. Levy
Robert P. Davis
VENABLE LLP
575 7th Street, N.W.
Washington, DC 20004
(202) 344-4732

Counsel for Amazon Fulfillment Services, Inc.

October 16, 2015